

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UPSOLVE, INC. and REV. JOHN UDO-  
OKON,

Plaintiffs,

-v-

LETITIA JAMES, in her official capacity as  
Attorney General of the State of New York,

Defendant.

Case No. \_\_\_\_\_

**NOTICE OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law and declarations, exhibits in support, and complaint in this action, dated January 25, 2022, Plaintiffs Upsolve Inc., and Rev. John Udo-Okon (“Plaintiffs”), by and through their undersigned counsel, will move this Court, on such date as the Court may set, for an Order pursuant to Rule 65(a) of the Federal Rules of Civil Procedure enjoining Defendant and other state agencies—as well as their agents, offices, and employees—from applying New York’s unauthorized practice of law rules and taking any action that would interfere with Plaintiffs’ intended exercise of their constitutional rights to provide free, reliable, narrowly-circumscribed legal advice to low-income individuals facing debt collection lawsuits.

Dated: New York, New York  
January 25, 2022

Respectfully submitted,

/s/ Gregory Silbert  
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*\*Pro hac vice* motion forthcoming

*Counsel for Plaintiffs*